

1 Ann Hobart, Bar No. 019129  
2 Jordan Kendall, Bar No. 038647  
3 Assistant Attorneys General  
4 Arizona Attorney General's Office  
5 2005 N. Central Avenue  
6 Phoenix, Arizona 85004  
7 Telephone: (602) 542-8347  
8 (602) 542-7687  
9 Facsimile: (602) 542-7644  
10 Ann.Hobart@azag.gov  
11 Jordan.Kendall@azag.gov  
12 EmploymentLaw@azag.gov  
13  
14 Attorneys for Defendants State of Arizona,  
15 Michael R. Sheldon, Aaron Bowen,  
16 Lea'cher Carter, and Unique Coleman

11 **IN THE UNITED STATES DISTRICT COURT**  
12 **FOR THE DISTRICT OF ARIZONA**

13 Matthew Phillip Solan,

14 Plaintiff,

15 vs.

16 The State of Arizona; Jennifer L.  
17 Cunico; Michael R. Sheldon; Aaron  
18 Bowen, Calvin J. Flowers; Steven Kwoh;  
19 Kindra Ochoa, Lea'cher Carter, Unique  
20 Coleman; John Does 1-100; Jane Does 1-  
21 100; Black Corporations 1-10; and White  
22 Entities 1-10,

Defendants.

Case No: CV-24-02061-JJT-DMF

**DEFENDANTS' NOTICE OF ERRATA  
REGARDING RESPONSE TO  
PLAINTIFF'S MOTION FOR  
PRELIMINARY INJUNCTION (DOC.  
25)**

23 Defendants' counsel respectfully requests that the Court and Plaintiff take notice  
24 of a correction to an error in Defendants' response to Plaintiff's motion for preliminary  
25 injunction (doc. 25) that Plaintiff brought to her attention in his reply in support of that  
26 motion (doc. 27 at 9). Plaintiff correctly noted that a word was dropped from the long  
27 sentence that appears at the end of Defendants' response. (*See* Doc. 25 at 11:15-21.)  
28 The inadvertently omitted word is "acknowledge." Thus, the sentence should read:

1 [Solan's] balancing of the "minor administrative inconvenience required  
2 by law" that Defendants will suffer if Foxy's clone is allowed to live with  
3 Solan at the Forensic Hospital, against the "unnecessarily prolonged  
4 hospitalization and protracted involvement in the criminal justice system"  
5 that he will continue to suffer if she is not, assumes a likelihood of success  
6 on the merits of his ADA and Rehab Act claims that he has not established  
7 and reflects a fundamental failure to *acknowledge* the consequences of  
8 his own actions and choices.

9 (Doc. 25 at 11:15-21 corrected.)

10 Respectfully submitted this 2nd day of May, 2025.

11 Arizona Attorney General's Office

12 /s/ Ann Hobart

13 Ann Hobart  
14 Jordan Kendall  
15 Assistant Attorneys General  
16 Attorneys for Defendants

17 I certify that I electronically transmitted  
18 the attached document to the Clerk's Office  
19 using the CM/ECF System for filing this  
20 2nd day of May, 2025.

21 Mailed and emailed this 2<sup>nd</sup> day of May, 2025, to:

22 Matthew P. Solan  
23 c/o Arizona State Hospital  
24 501 N. 24<sup>th</sup> Street  
25 Phoenix, Arizona 85008-6056  
26 legal@fox-ranch.com  
27 Plaintiff

28 /s/ Deb Sawyer